

Judge: Karen A. Overstreet
Chapter: 13
Hearing Date: June 10, 2015
Hearing Time: 9:00 am
Hearing Location: Marysville Municipal Court
1015 State Ave. Courtroom 1
Marysville, WA 98270

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

In Re:

MARY JANE PENMAN,

Debtor.

IN CHAPTER 13 PROCEEDING
NO. 15-11968

TRUSTEE'S OBJECTION TO CONFIRMATION

The Trustee objects to confirmation of the debtor's plan, filed March 30, 2015 (ECF No. 2) as follows:

Based on the claim filed by the IRS, the debtor has not filed her 2014 tax return. The IRS estimates the priority debt to be \$19,581.10. This return will need to be filed prior to confirmation. The debtor's schedule A indicates the debtor has an interest in a building and land at 19211 144th Ave NE Woodinville WA. The debtor testified that the building is held in a trust set up by her father and that this is her source of income listed on Schedule I. The debtor testified that she has a 1/6 interest in the trust. The debtor will need to provide the trust documents to the Trustee to verify this information. The Trustee cannot accurately determine the liquidation value without this information. Based on the claim filed by Washington Federal, the debtor's primary mortgage is delinquent. The debtor will need to provide for the ongoing mortgage in Section IV.C.1 and a cure of the arrears in Section IV.C.3. The debtor will need to remove the language from Section XII of the plan as it contains facts not appropriate for the plan. The debtor will need to file her adversary complaint against BECU. The debtor's schedule J includes a payment of \$200.00 for property taxes. The debtor should explain what property tax this is paying.

TRUSTEE'S OBJECTION TO CONFIRMATION - 0

Chapter 13 Bankruptcy Trustee
600 University St. #2200
Seattle, WA 98101
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THE TRUSTEE REQUESTS:

That the Court enter an order denying confirmation of the debtor's plan, and setting deadlines for filing and noting a feasible amended plan.

Dated: June 08, 2015

/s/ K. Michael Fitzgerald
K. Michael Fitzgerald, WSBA #8115
Chapter 13 Trustee